



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

April 2, 2008

RQ-2

Douglas A. Campbell, Treasurer
Keystone America PAC
607 14th Street NW Suite 800
Washington, DC 20005

Response Due Date:
May 2, 2008

Identification Number: C00439992

Reference: Year End Report (10/18/07-12/31/07)

Dear Treasurer:

This letter is prompted by the Commission's preliminary review of the report(s) referenced above. This notice requests information essential to full public disclosure of your federal election campaign finances. **Failure to adequately respond by the response date noted above could result in an audit or enforcement action.** Additional information is needed for the following 3 items:

1. Please clarify all expenditures made for "Catering", "Fundraising Consulting Services", and "Fundraising Consulting Services & Travel" on Schedule B. If a portion or all of these expenditures were made on behalf of specifically identified federal candidates, this amount should be disclosed on Schedules B or E supporting Lines 23 or 24 and include the amount, name, address and office sought by each candidate. 11 CFR §§104.3(b) and 106.1
2. Schedule B discloses an expenditure(s) for "Postage & Catering" and "Printing" If a portion or all of these expenditures were for public communications (as defined by 11 CFR §100.26) or voter drive activity (under 11 CFR §106.6(b)(2)(i)) containing express advocacy as defined under 11 CFR §100.22, this would constitute an in-kind contribution or an independent expenditure and should be properly disclosed on a Schedule B or E supporting Line 23 or 24 as appropriate. Public communications and voter drive activity that refer to a clearly identified Federal candidate, but that do not expressly advocate the election or defeat of that candidate should be reported on Schedule B for Line 21(b) of the Detailed Summary Page. Please clarify whether this activity contained express advocacy and amend your report to properly disclose this activity, if necessary.

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